

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASA EXPRESS CORP,

Plaintiff,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case Nos. 18-cv-11940 (AT)
19-cv-3123 (AT)

PHARO GAIA FUND LTD., *et al.*,

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

NOTICE OF CROSS-MOTION FOR A STAY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated January 16, 2020, Defendant Bolivarian Republic of Venezuela (“the Republic”), by and through its undersigned counsel, make a cross-motion to this Court before the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order staying this case pursuant to the Court’s inherent authority and international comity, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the July 8, 2019 Scheduling Order entered in these actions (19-cv-3123, ECF No. 26; 18-cv-11940, ECF No. 46), Plaintiffs' opposition to the Republic's cross-motion for a stay is to be filed by February 6, 2020, and the Republic's reply in support of its cross-motion for a stay is to be filed by February 27, 2020.

The Republic respectfully requests to be heard on its cross-motion for a stay at a time convenient to the Court.

Dated: January 16, 2020
New York, New York

Respectfully submitted,

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